

### REMARKS

Claims 1-6, 8-12 and 19-23 are pending in this application with claims 1-3 and 19 being independent. Claims 1 and 19 have been amended. Support for the present amendments may be found in the application at, for example, page 22, line 22 to page 24, line 19 and FIG. 12.

As a preliminary matter, applicants thank the Examiner for the telephonic interview initiated by the Examiner with the undersigned on May 2, 2007. During the interview, the rejection of independent claims 1 and 19 as being unpatentable over European Patent Number 1,204,087 A1 ("Tokimoto") in view of U.S. Patent Number 6,965,361 ("Sheats") and the rejection of independent claims 2 and 3 as being unpatentable over U.S. Publication Number 2003/0117348 ("Knapp") in view of Sheats were discussed.

The Examiner kindly indicated that the application would be in condition of allowance if applicants were to cancel claims 1 and 19, along with their dependent claims. The Examiner indicated that independent claims 2 and 3, along with their dependent claims, were considered to be allowable. In reliance on the Examiner's assertion, applicants have decided to forgo the appeal process and further amend independent claims 1 and 19 to place all the pending claims in the condition of allowance. To this end, applicants present the above stated amendments and the following remarks.

#### ***Claim Rejections – 35 U.S.C. § 103***

Claims 2-6, 8-12, 21 and 22 were rejected under 35 U.S.C. § 103 as being unpatentable over Knapp in view of Sheats. This rejection is not discussed further in view of the Examiner's statement that these claims are allowable in the light of the references of record and previously submitted arguments.

Claims 1, 19, 20 and 23 were rejected under 35 U.S.C. § 103 as being unpatentable over Tokimoto in view of Sheats. Applicants have further amended independent claims 1 and 19 to overcome the cited references.

As amended, independent claims 1 and 19 recite that a pixel comprises first to n-th light-emitting elements that comprise first to (n+1)-th pixel electrodes and first to n-th light-

emitting layers that emit different emission colors, where the first to n-th light emitting elements are laminated in a stacked, alternating relationship such that each light-emitting layer is between and in contact with two pixel electrodes and each pixel electrode, with the exception of the first pixel electrode and the (n+1)-th pixel electrode, is between and in contact with two light emitting layers.

Applicants request reconsideration and withdrawal of the rejection of claims 1 and 19 because Tokimoto and Sheats, either alone or in combination, fail to describe or suggest at least that a pixel comprises first to n-th light-emitting elements that comprise first to (n+1)-th pixel electrodes and first to n-th light-emitting layers that emit different emission colors, where the first to n-th light emitting elements are laminated in a stacked, alternating relationship such that each light-emitting layer is between and in contact with two pixel electrodes and each pixel electrode, with the exception of the first pixel electrode and the (n+1)-th pixel electrode, is between and in contact with two light emitting layers.

The Final Office Action concedes that Tokimoto fails to teach that the first to n-th light emitting elements are laminated, and turns to Sheats for such teachings. However, Sheats is equally deficient.

Sheats relates to a display device using organic electroluminescent materials. Sheats at col. 1, lines 5-9. The display device includes plurality of light emitting pixels, with each pixel including a transistor, a driving circuit, and an organic light emitting diode ("OLED"). Sheats at Abstract. FIG. 4 of Sheats illustrates a cross-sectional view of the portion of display (80) containing a single pixel. Sheats at col. 4, lines 37-39. As shown in FIG. 4 and described in column 4, lines 44-46, the pixel includes only a single OLED laminated on its transistor (71) and not a plurality of OLEDs laminated in a stacked relationship as recited in claims 1 and 19 and shown in FIG. 12 of the present application.

Accordingly, Sheats fails to describe or suggest that the first to n-th light emitting elements are laminated, where n is a natural number,  $2 \leq n$ , and Sheats certainly fails to describe or suggest the structure of the laminated light emitting elements as recited by the amended claims. In particular, Sheats fails to describe or suggest that the first to n-th light emitting

elements are laminated in a stacked, alternating relationship such that each light-emitting layer is between and in contact with two pixel electrodes and each pixel electrode, with the exception of the first pixel electrode and the (n+1)-th pixel electrode, is between and in contact with two light emitting layers. For at least these reasons, applicants request reconsideration and withdrawal of the rejection of claims 1 and 19, along with their dependent claims 20 and 23.

Applicants submit that all claims are in condition for allowance.

No fee is believed to be due at this time. Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

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John F. Hayden  
Reg. No. 37,640

Fish & Richardson P.C.  
1425 K Street, N.W.  
11th Floor  
Washington, DC 20005-3500  
Telephone: (202) 783-5070  
Facsimile: (202) 783-2331